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May 22, 2025

By Electronic Filing

The Hon. Lewis J. Liman
United States District Judge
U.S. District Court for the Southern District of New York
500 Pearl Street, Room 1620
New York, NY 10007

Re: *Lively et al. v. Wayfarer Studios LLC et al.*
Case Nos. 1:24-cv-10049-LJL, 1:25-cv-0049-LJL, 1:25-cv-00779-LJL
Letter-Motion for Extension of Time

Dear Judge Liman:

This firm represents Non-Party Journalist James Vituscka in connection with the subpoena *duces tecum* (the “Subpoena”) served on him by Consolidated Defendants Leslie Sloane and Vision PR, Inc. (the “Sloane Parties”) in the above-referenced action. We write, pursuant to the Court’s Individual Practices, to request an extension of time to respond to the Sloane Parties’ Letter-Motion to Compel James Vituscka to Produce Documents (“Letter-Motion”), ECF No. 232, until **May 28, 2025**. In support of his request, Mr. Vituscka states as follows:

- (1) The Sloane Parties filed their Letter-Motion on May 21, 2025, notifying Mr. Vituscka, a non-party who does not receive CM/ECF notifications for this matter, of the filing at 8:45 p.m. last night.
- (2) Under this Court’s Individual Practices, Mr. Vituscka’s response to the Sloane Parties’ Letter-Motion is due May 23, 2025.
- (3) Mr. Vituscka has not made any prior requests for adjournment or extension of time.
- (4) An adjournment of the deadline to respond to the Sloane Parties’ Letter-Motion is necessary and warranted to allow the parties time to further meet and confer and possibly resolve the outstanding issues. Finally, an adjournment would also accommodate vacation schedules over the intervening holiday weekend.

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- (5) The Sloane Parties consent to the requested extension.
- (6) There is no hearing date set for the Sloane Parties' Letter-Motion, and Mr. Vituscka, who is not a party to this action, has no other business before the Court.

Based on the foregoing, Mr. Vituscka respectfully requests that the Court grant his request for an extension of time to respond to the Sloane Parties' Letter-Motion until May 28, 2025.

Respectfully submitted,

A handwritten signature in cursive script that reads "Lynn Oberlander".

Lynn Oberlander

Counsel for Non-Party Journalist James Vituscka